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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HAIPING SU,
Plaintiff,

v.

UNITED STATES OF AMERICA;
NATIONAL AERONAUTICS AND
SPACE ADMINISTRATION, an Agency of
the United States; CHARLES F. BOLDEN,
JR. in his official capacity as the
Administrator of NASA; SIMON PETER
WORDEN, in his official capacity as
Director of NASA Ames Research Center;
ROBERT DOLCI, in his official capacity as
Installation Security Chief at NASA Ames;
REGINALD WADDELL, in his official
capacity at NASA; and Does 1-100,

Defendants.

Case No. C 09-02838 JW

**STIPULATION AND [PROPOSED]
ORDER RE: ENLARGEMENT OF
TIME FOR PARTIES TO DISCLOSE
EXPERTS AND REBUTTAL EXPERTS**

[Civil Local Rule 6-2, 7-12]

Pursuant to Civil L.R. 6-2 and 7-12, and subject to approval of the Court, the parties to this action stipulate to request an Order by this Court (1) to enlarge by two weeks the time for the parties to serve on all other parties the name, address, qualifications, résumé and a written report which complies with Fed. R. Civ. P. 26(a)(2)(B), and correspondingly, (2) to enlarge by four weeks the time for the parties to disclose rebuttal expert witnesses.

On June 24, 2010, the Court issued an Order Consolidating Cases; Setting Scheduling Order. This Order provides that the deadline to disclose experts is January 24, 2011, and the

1 deadline to disclose rebuttal experts is February 7, 2011. Plaintiff has retained an expert and will
 2 disclose this expert to defendant by the original January 24, 2011, date. However, due to the
 3 press of business for counsel and plaintiff's expert, and in order to prepare a satisfactory expert
 4 report, plaintiff requires additional time before the report can be tendered. Defendant has
 5 graciously agreed to extend the deadline for expert disclosures (so long as the Court approves the
 6 parties' stipulation), and will need time to prepare any rebuttal.

7 Therefore, pursuant to stipulation, the deadline for expert witness disclosures would be
 8 February 7, 2011, and the deadline for rebuttal expert witness disclosures would be March 7,
 9 2011. This enlargement will alter only the due date of expert disclosures and rebuttal expert
 10 disclosures, and will not affect any hearing dates or deadlines already fixed by Court order other
 11 than the two aforementioned dates. The Declaration of Michael Reedy is provided in support of
 12 this Stipulated Request.

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 14 DATED: January 21, 2011

McMANIS FAULKNER

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 18 JAMES McMANIS
 MICHAEL REEDY

19 Attorneys for Plaintiff, Dr. Haiping Su

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 21 DATED: January 21, 2011

UNITED STATES DEPARTMENT OF
 JUSTICE

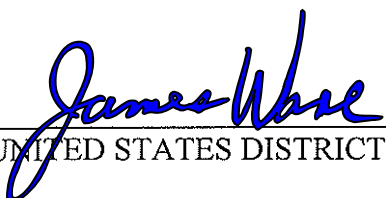
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 KAREN SEIFERT
 J. STEVEN JARREAU

26 Attorneys for Defendants

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 25, 2011


UNITED STATES DISTRICT JUDGE